

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

**IN RE:**

Denise Shannon

Debtor(s)

Case No.: 22-12435  
Chapter: 13  
Plan filed on 10/27/2022  
Confirmation Hearing: 12/19/22

---

**OBJECTION TO CONFIRMATION OF PLAN FILED ON 10/27/2022**

---

**NOW COMES** AMERICAN ADVISORS GROUP, and/or its assigns (hereinafter “Movant”), by and through its attorneys, Codilis & Associates, P.C., and moves this Honorable Court for an Order denying confirmation of Debtor’s plan filed on 10/27/2022 and in support thereof states as follows:

1. Debtor filed a petition under Chapter 13 of Title 11, United States Bankruptcy Code on 10/26/2022 and this Court has jurisdiction pursuant to 28 U.S.C. §1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois;

2. Movant intends to file a claim secured by an interest in the real property commonly known as 8638 S Muskegon Avenue, Chicago, Illinois;

3. Movant intends to file a proof of claim indicating an estimated total payoff in the amount of \$133,770.10 but the proposed plan provides for payment of only \$131,713.00;

4. Section 3.2 of the Plan provides to pay Movant’s secured claim at an interest rate of 0.00%;

5. Movant is entitled to interest at the current prime rate of 7.00% plus a 1.00-3.00% risk factor pursuant to the Supreme Court’s decision in *In re: Till*;

6. Sufficient grounds exist for denial of confirmation as Debtor's plan:
  - a. Fails to pay Movant's claim in full;
  - b. Fails to provide for an appropriate interest rate;

8. Movant has incurred attorney fees and/or costs in connection with this bankruptcy proceeding subject to court approval, including: \$550.00 for Objection to confirmation of the Chapter 13 plan including plan review and attending confirmation, if not separately billed.

**WHEREFORE**, AMERICAN ADVISORS GROUP prays this Court deny confirmation of the plan allowing the fees and costs described herein to be added to the indebtedness pursuant to the terms of the note and mortgage, and for such other and further relief as this Court may deem just and proper.

Dated this November 17, 2022.

Respectfully Submitted,  
Codilis & Associates, P.C.

By: /s/ Peter C. Bastianen

Rachael A. Stokas ARDC#6276349  
Peter C. Bastianen ARDC#6244346  
Joel P. Fonferko ARDC#6276490  
Berton J. Maley ARDC#6209399  
Terri M. Long ARDC#6196966  
**Codilis & Associates, P.C.**  
15W030 North Frontage Road, Suite 100  
Burr Ridge, IL 60527  
(630) 794-5300  
File No. 14-19-07143

NOTE: This law firm is a debt collector.